

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA**

IN RE: SARA JEAN FRANCO : CHAPTER 13
: :
DEBTOR : CASE NO. 17-17031 elf

SPECIALIZED LOAN SERVICING LLC, as
servicer for BNY MELLON f/k/a THE BANK
OF NEW YORK successor

Movant

vs

Sara Jean Franco.....Debtor
Alejandro Franco.....Co-Debtor

William C. Miller, Esq.Trustee

**DEBTOR'S ANSWER TO SPECIALIZED LOAN SERVICING LLC'S
MOTION FOR RELIEF FROM STAY**

1. Denied that Movant is servicer for the Real Party in interest. Strict proof of such demanded.

2. Admitted.

3. Denied that "Movant" is the holder of the mortgage; to the contrary, the "Movant" is Specialized Loan Servicing LLC according to the pleading. The owner is another entity according to the pleading.

4. Admitted.

5. Admitted.

6. Denied. Debtor has no knowledge of any payments made by co-debtor and therefore must deny the allegation and demand strict proof.

7. Denied. Strict proof demanded.

8. Denied as stated.

9. Denied as a conclusion of law. By way of further answer, No service has been made upon co-debtor who resides other than at the address served. Furthermore, Movant knows of co-debtor's address, yet failed to serve him there, as is stated in the Certificate of Service.

10. Denied as a request for future declaratory relief. Furthermore, whatever remedies are available to movant, remain available even if relief were to be granted.

WHEREFORE, Debtor request your honorable court to deny the said Motion.

Respectfully submitted,

/s/ Joseph F. Claffy
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